



**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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and Attorney-in-Chief

Southern District of New York  
*Jennifer L. Brown*  
Attorney-in-Charge

October 29, 2021

**BY ECF**

Honorable Judge George B. Daniels  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**SO ORDERED:**

*George B. Daniels*  
**George B. Daniels, U.S.D.J.**

**Dated: NOV 01 2021**

**Re: United States v. Sandra Maria De Oliveira Lindo**  
**18 Cr. 782 (GBD)**

Dear Judge Daniels:

With the consent of the Government, I write to request that Ms. Lindo's passport be temporarily released so that it can be taken to the United States Citizenship and Immigration Services (UCIS) field office in Atlanta, Georgia, in order for Ms. Lindo to receive proof of her lawful status as a legal permanent resident. This proof will allow her to, maintain and update her health insurance so that she can continue to receive mental and physical health treatment, renew her driver's license, and find new employment

On October 7, 2020, Ms. Lindo was released on her own recognizance, with travel restricted to SDNY/EDNY/N.D.Ga. and S.D.Ga. She was ordered to surrender her travel documents, including her passport, and make no new applications. We have been in touch with AUSA Stephanie Lake in this case and she has indicated that the Government does not object to this request. Ms. Lindo's supervising pretrial officer, Amanda Hornbeck, informs me that Pretrial Services will assist in whatever the Court orders, which would include receiving and monitoring release of the passport.

I specifically request that the Pretrial Services Office of the Southern District of New York be ordered to send Ms. Lindo's passport to Ms. Lindo's supervising officer, Officer Amanda Hornbeck in Gainesville, Florida, and that Officer Hornbeck be permitted to release the passport to Ms. Lindo's partner and former DEA Agent Mark Webb for the sole purpose of bringing it to Ms. Lindo's appointment with UCIS. The passport would be released to Mr. Webb for the day of Ms. Lindo's appointment and returned immediately after the appointment. As noted above, the Government consents to this request and Officer Hornbeck has informed defense counsel that she will assist in whatever the Court orders.

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Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Zawadi Baharanyi

Assistant Federal Defender

(212) 417-8735

cc: AUSA Stephanie Lake  
Officer Amanda Hornbeck